

JAP:MPC

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M 11-280

- - - - -X

UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960(b) (1) (A))

MIRIAM SIRE DIALLO,

Defendant.

- - - - -X

EASTERN DISTRICT OF NEW YORK, SS:

CHRISTIAN ALBANESE, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about March 15, 2011, within the Eastern District of New York and elsewhere, defendant MIRIAM SIRE DIALLO did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing heroin, a Schedule I controlled substance.

(Title 21, United States Code, Sections 952(a) and 960(b) (1) (A)).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about March 15, 2011, MIRIAM SIRE DIALLO arrived at John F. Kennedy International Airport in Queens, New York, aboard Air France Flight 22 from Paris, France.

2. Defendant MIRIAM SIRE DIALLO was selected for a Customs and Border Protection ("CBP") examination. During the exam the defendant declared two checked brown roller bags, a pocket book and plastic bag for inspection. The defendant stated that all of the items belonged to her.


4. The defendant presented the two brown roller bags for further inspection. The defendant admitted to packing both bags and claimed ownership to the contents of the bags.

5. During an inspection of the defendant's suitcase, a CBP officer discovered plastic bags containing a brown substance. The plastic bags were wrapped within articles of clothing. The brown substance field-tested positive for the presence of heroin.

6. The total approximate gross weight of the heroin recovered was 5026.6 grams.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant MIRIAM SIRE DIALLO be dealt with according to law.



CHRISTIAN ALBANESE
Special Agent
U.S. Department of Homeland Security
Homeland Security Investigations

Sworn to before me this
16th day of March 2011



UNITED STATES
EASTERN DISTRICT OF NEW YORK



S/ Pollak

/E